CLERK'S COPY.

TRANSCRIPT OF RECORD

SUPREME COURT OF THE UNITED STATES

OCTOBER TERM, 1937

No. 337

GUY T. HELVERING, COMMISSIONER OF INTERNAL REVENUE, PETITIONER

vs.

BANKLINE OIL COMPANY

No. 338

BANKLINE OIL COMPANY, PETITIONER

vs.

COMMISSIONER OF INTERNAL REVENUE

ON WRITS OF CERTIORARI TO THE UNITED STATES CIRCUIT COURT OF APPEALS FOR THE NINTH CIRCUIT

PETITIONS FOR CERTIORARI FILED SEPTEMBER 7, 1937

CERTIORARI GRANTED OCTOBER 25, 1937

No. 8294

United States
Circuit Court of Appeals
For the Ninth Circuit.

BANKLINE OIL CO., a corporation,
Petitioner,

vs.

COMMISSIONER OF INTERNAL REVENUE,
Respondent.

Transcript of the Record

Upon Petition to Review an Order of the United States Board of Tax Appeals.

PARKER PRINTING COMPANY, 549 SANSOME STREET, SAN FRANCISCO

SUPREME COURT OF THE UNITED STATES

OCTOBER TERM, 1937

No. 387

GUY T. HELVERING, COMMISSIONER OF INTERNAL REVENUE, PETITIONER

vs.

BANKLINE OIL COMPANY

No. 388

BANKLINE OIL COMPANY, PETITIONER

vs.

COMMISSIONER OF INTERNAL REVENUE

ON WRITS OF CERTIORARI TO THE UNITED STATES CIRCUIT COURT OF APPEALS FOR THE NINTH CIRCUIT

INDEX

	Page
Proceedings before United States Board of Tax Appeals	1
Docket entries, No. 56484	1
Docket entries, No. 72502	4
Petition, No. 56484	7
Exhibit A—Notice of deficiency	11
Answer, No. 56484	17
Motion for leave to file amended petitions	18
Amended petition, No. 56484	19
Answer to amended petition, No. 56484	26
Petition, No. 72502	28
Exhibit A—Notice of deficiency	32
Answer, No. 72502	34
Amended petition, No. 72502	35
Answer to amended petition, No. 72502	41
Findings of fact and opinion, Morris, M	42
Concurring opinion, Black, M	55
Decision (Both dockets)	57
Order vacating decision as to No. 72502	58

Proceedings before United States Board of Tax Appeals—Continued. Page
Decision, No. 72502 58
Petition for review and assignments of error 59
Notice of petition for review 66
Statement of evidence 67
Caption 67
Stipulation of facts 68
Exhibit No. 1—Statement showing income attributable to operations under State Lease No. 89 during calendar year 1930 75
Testimony of Lloyd Aubert 75
Exhibit No. 1—Contract dated October 9, 1928, by and between Bankline Oil Company and Richfield Oil Company 76
Exhibit No. 2—Contract dated October 25, 1923, between Bankline Oil Company and United Oil Company 89
Exhibit No. 3—Contract dated May 25, 1925, between The Superior Oil Company and Bankline Oil Company 99
Exhibit Nos. 4 and 5—Contracts [not set out herein] 106
Exhibit No. 6—Contract dated June 9, 1922, between General Petroleum Corporation and Bankline Oil Company 107
Testimony of Scott H. Dunham 116
Exhibit No. 8—Summary showing gross income derived under each casinghead gas contract, etc 118
Testimony of J. Lee Cross 121
T. L. Taggart 125
John McFarland 127
F. K. Baxter 127
Order approving statement of evidence 141
Praecipe for record 141
Clerk's certificate 143
Proceedings in U. S. C. C. A., Ninth Circuit 144
Order of submission 144
Order directing filing of opinions and judgment 144
Opinion, Wilbur, J 145
Concurring opinion, Haney, J 154
Judgment 154
Clerk's certificate 155
Orders allowing certiorari 156

APPEARANCES.

For Taxpayer:
A. L. WEIL, Esq.,
HUGH C. BICKFORD, Esq.

For Comm'r:
GEORGE D. BRABSON, Esq.,
J. W. SMITH, Esq.

Docket No. 56484.

BANKLINE OIL COMPANY,

Petitioner,

vs.

COMMISSIONER OF INTERNAL REVENUE,

Respondent.

DOCKET ENTRIES.

1931

Apr. 16—Petition received and filed. Taxpayer notified. (Fee paid)

" 16—Copy of petition served on General Counsel.

Jun. 1—Answer filed by General Counsel.

" 16—Copy served on taxpayer. Assigned to Circuit Calendar.

1934

Apr. 18—Hearing set week of July 2, 1934 at San Francisco, Calif.